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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TAMARA F. GILES,

Plaintiff

v.

NANCY A. BERRYHILL, Acting
Commissioner of Social Security,¹

Defendant.

) Case No: 2:16-cv-01604-GMN-PAL

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**JOINT STIPULATION FOR EXTENSION
OF TIME TO FILE DEFENDANT'S
CROSS-MOTION TO AFFIRM
(Second Request)**

¹ Nancy A. Berryhill is now the Acting Commissioner of Social Security. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Nancy A. Berryhill should be substituted for Carolyn W. Colvin as the defendant in this suit. No further action needs to be taken to continue this case by reason of the last sentence of section 205(g) of the Social Security Act. 42 U.S.C. § 405(g).

1 Plaintiff Tamara F. Giles (Plaintiff) and Defendant Nancy A. Berryhill, Acting
2 Commissioner of Social Security (the Commissioner), stipulate, with the approval of this Court,
3 to an extension of time for the Commissioner to file her Cross-Motion To Affirm by thirty days
4 from March 9, 2017 to April 10, 2017, with all other dates in this Court's Scheduling Order
5 extended accordingly. This is the Commissioner's second request for an extension.

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18 There is good cause because, since the Commissioner's prior extension, counsel has been
19 out of the office on approved leave for more than one month. Since returning to the office, the
20 Commissioner's counsel has been handling a large number of District Court cases in addition to
21 this one, with three other briefs due this week, two due next week, and two due the following week.
22 Further, counsel has numerous other deadlines this month, including ongoing discovery in an
23 employment case and a hearing in an administrative matter next week. As a result, the
24 Commissioner needs additional time to properly respond to the issues Plaintiff raised in his Motion
25 For Reversal And/Or Remand. Counsel apologizes for the delay and makes this request in good
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1 faith. Plaintiff has no objection.

2 Respectfully submitted,

3 Date: March 9, 2017

JOSHUA R. HARRIS
Attorney at Law

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5 By: /s/* Marc V. Kalagian
MARC V. KALAGIAN
Attorney at Law
6 *by email authorization on 3/9/17

7 Attorneys for Plaintiff

8
9 Date: March 9, 2017


DANIEL G. BOGDEN
United States Attorney
10 BLAINE T. WELSH
11 Chief, Civil Division

12 By: /s/ April A. Alongi
13 APRIL A. ALONGI
Special Assistant United States Attorney

14 Attorneys for Defendant

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17 IT IS SO ORDERED.

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21 DATE: March 15, 2017


22 THE HONORABLE PEGGY A. LEEN
United States Magistrate Judge
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DEFENDANT'S CERTIFICATE OF SERVICE

I certify that I caused the Joint Stipulation For Extension Of Time To File Defendant's Cross-Motion To Affirm (Second Request) to be served, via CM/ECF notice, on:

MARC V. KALAGIAN
Attorney at Law
rohlfig.kalagian@rksslaw.com

Date: March 9, 2017

DANIEL G. BOGDEN
United States Attorney
BLAINE T. WELSH
Chief, Civil Division

By: /s/ April A. Alongi
APRIL A. ALONGI
Special Assistant United States Attorney

Attorneys for Defendant